

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Wildfire Safety Division
California Public Utility Commission

**COMMENTS OF THE GREEN POWER INSTITUTE ON THE
WSD 2021 GUIDANCE ON ENGAGEMENT OF INDEPENDENT EVALUATORS**

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Pursuant to the February 2021, *WSD 2021 Guidance on Engagement of Independent Evaluators Pursuant to Public utilities Code §8386.3*, the Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides these *Comments of the Green Power Institute on the WSD 2021 Guidance on Engagement of Independent Evaluators*.

GPI generally supports the draft 2021 Guidance on Engagement of Independent Evaluators (IE). We provide recommendations regarding clarifying reporting deadlines and details, as well as ensuring that there is an ongoing technical review process that supports a detailed and cross-comparative assessment of the WMP content and proposed actions.

GPI supports the clause that “IEs are to view the above guidance(s) as minimum expectations and are encouraged to expand evaluation criteria within scope of statute, when possible (Draft IE Guidance, p. 2).” However, this may lead to substantial differences in report detail, approach, and quality between the various IEs that are retained by the electrical corporations. In future years it may be prudent and necessary to select and standardize exemplary reports and/or report elements in future IE reporting standards based on the output of the first round and subsequent rounds of IE reporting. Through this iterative process the reports can become more standardized and comprehensive in a way that supports a more efficient assessment and review.

GPI recommends specifying a deadline for Draft IE reports in question 5 of the FAQ section of the Guidance on Engagement. Q&A 5 in the guidance states: **Q.** Does WSD want to see a draft report before for the July 1st due date? **A.** Yes. July 1 is only 4 months away from the time of stakeholder comments on the Guidance on Engagement and likely even sooner from the point that the final Guidance is filed. The WSD should

provide clear instruction as to when a draft report is required for general IE planning purposes and given the short evaluation timeframe in 2021. Both the July 1 and draft report deadline should be added to the table on “page 3 of 19.” In Section 3.5, Task 5, Item 1, update the text to include the added (underlined) text, which reads: “Produce a report on July 1 of each year... (Draft IE Engagement, Page 9 of 19).” The Draft report deadline should also be noted in Task 5.

GPI notes that employing separate IEs to perform WMP compliance evaluations for each electrical corporation will almost surely not provide comparative plan and plan implementation analysis that is currently supported by a diversity of stakeholders under the CPUC Intervenor program. This assessment includes an evaluation of existing best practices that are currently in use, or not yet in use, by the electrical corporations and that should be adopted by all electrical corporations going forward. These Utility cross-comparisons also inform ongoing development and adjustments to the Maturity Model survey. The WSD should explore how it will fill the void of electric corporation cross comparison after the WSD and WMP jurisdiction is moved to the Office of Energy Infrastructure Safety (OEIS) of the California Natural Resources Agency (CNRA).

While the Maturity Model Self-Assessment may be intended to support a WMP cross comparison, this approach has little ability to evaluate the detailed methods used in each electrical corporation’s WMP. For example, the Maturity Model is unable to show that the Machine Learning Risk Assessment model design, training, and validation methods used by SCE are superior to those used by PG&E and can lead to a more robust wildfire and ignition risk assessment. The Maturity Model is only likely to reflect that both Utilities are using advanced, data-science-based risk modeling. The WSD should develop a method that supports expert and external, utility and cross-utility, methodological comparisons after the migration to the OEIS.

The IE guidance does not include a standardized report format or guidance. GPI remains concerned that the quality and format of draft and final IE reports from different IE entities may vary widely. This could hinder the WSD’s ability to efficiently review the reports as well as affect the ability to make direct and parallel assessments of each

electrical corporation's degree of WMP compliance and methodology. While we suspect that developing standardized IE report content and format will be an iterative process, starting with at least a broad report outline for IEs to follow will likely improve content consistency and the report review process from the outset, and which can be refined over multiple annual cycles.

Conclusions

The GPI urges the Commission to adopt our recommendations.

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Respectfully Submitted,



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